

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Clark Capital Management Group, Inc.,	:	
	:	
Plaintiff,	:	
	:	Civil Action No.:
v.	:	
	:	JURY TRIAL DEMANDED
RiverSource Life Insurance Company	:	
	:	
Defendant.	:	

COMPLAINT

Plaintiff, Clark Capital Management Group, Inc. (“Plaintiff” or “Clark Capital”), by and through its undersigned attorneys for its complaint against RiverSource Life Insurance Company (“RiverSource”) alleges as follows:

PARTIES

1. Plaintiff, Clark Capital Management Group, Inc., is a Pennsylvania corporation with a place of business at One Liberty Place, 1650 Market Street, 53rd Floor, Philadelphia, PA 19103. Clark Capital is the owner of the intellectual property at issue in this case.

2. Defendant, RiverSource Life Insurance Company, is a Minnesota corporation, with a principal address of 1099 Ameriprise Financial Center, Minneapolis, MN 55474.

JURISDICTION AND VENUE

3. This action arises under the Acts of Congress under the Lanham Act, Title 15 U.S.C. § 1051, et seq., and common law. As such, this Court has subject matter jurisdiction under the provisions of Title 28 U.S.C. §§ 1331 and 1338 because this action involves federal questions of law.

4. This Court may exercise personal jurisdiction over RiverSource. A substantial part of the events giving rise to this action have occurred and continue to occur in this judicial district. Moreover, RiverSource conducts business in Pennsylvania and in this judicial district. As such, RiverSource should reasonably expect that its activities might have consequences herein. Moreover, Pennsylvania's long arm statute, 42 Pa. C.S.A. § 5322(a), confers personal jurisdiction over RiverSource because RiverSource's business activities within the Commonwealth of Pennsylvania and in this judicial district are directly and/or indirectly infringing upon Clark Capital's rights, and otherwise causing harm to Clark Capital.

5. This court has original jurisdiction over the claims brought under federal law pursuant to 28 U.S.C. §§ 1331 and 1338(b) and 15 U.S.C. § 1121.

6. This Court has supplemental jurisdiction over the claims brought under the common law pursuant to 28 U.S.C. § 1338(b) and § 1367(a).

7. Venue is proper in this judicial district pursuant to Title 28 U.S.C. § 1391.

**BACKGROUND AS TO PLAINTIFF'S
BUSINESS AND ITS INTELLECTUAL PROPERTY**

8. Clark Capital is a registered investment advisor that offers a variety of financial services and products, including financial planning and investment advisory services, financial planning for retirement services, on-line financial planning services, wealth management, asset allocation and investment consulting services. Clark Capital also offers a variety of investment funds to its clients, which include individual high net worth investors, trusts, endowments, employee benefit plans, corporations, and municipalities. Clark Capital's financial services and products are designed to provide its clients with investment strategies to achieve an optimum mix or ratio of financial assets such as annuities, mutual funds, stocks, bonds, and cash holdings.

9. Clark Capital has adopted and used its NAVIGATOR® mark for its financial services and products, including financial planning and investment advisory services, financial planning for retirement services, on-line financial planning services, wealth management, asset allocation and investment consulting services. The NAVIGATOR® mark is also used by Clark Capital in the name of a series of NAVIGATOR® investment funds that Clark Capital offers to its clients.

10. Clark Capital has sought to register and has registered its NAVIGATOR® mark.

11. On October 29, 1991, Clark Capital registered on the Principal Register of the U.S. Patent and Trademark Office Registration No. 1,662,756 for NAVIGATOR for investment advisory services in the field of stocks and mutual funds. Clark Capital first used this mark as early as March 1987. Sections 8 and 15 Declarations have been filed and approved, thus, this mark has become incontestable. The registration has been renewed.

12. The above referenced registration is in full force and effect.

13. Clark Capital's NAVIGATOR® mark is strong. It is inherently distinctive and represents the exceedingly valuable goodwill of Clark Capital.

14. Clark Capital's NAVIGATOR® mark has become well known throughout the financial planning, wealth management, asset allocation and investment advisory field. Through its use of the NAVIGATOR® mark, Clark Capital has developed an excellent reputation for its services and products and has been recognized as a leader among boutique companies in the financial industry for these services and products.

15. The market success of Clark Capital's financial and investment related services offered under the NAVIGATOR® mark has been extraordinary, and the relevant public has

come to rely upon and recognize the Clark Capital's services and products by its NAVIGATOR® mark, and the mark has substantial goodwill associated with it.

16. Clark Capital has vigorously defended its NAVIGATOR® mark against infringers and potential infringers. Clark Capital has filed many Opposition proceedings in the United States Patent and Trademark Office to prevent the registration of conflicting marks. Clark Capital has also filed suit in federal district court on many occasions in order to protect its NAVIGATOR® mark.

17. Clark Capital has repeatedly notified RiverSource of Clark Capital's NAVIGATOR® mark and requested that RiverSource discontinue all use of the term NAVIGATOR in connection with financial and investment advisory services and products.

BACKGROUND AS TO DEFENDANT'S UNLAWFUL CONDUCT

18. RiverSource is using the PORTFOLIO NAVIGATOR designation in connection with financial planning and investment advisory services, including use as the name of a series of investment funds. *See Exhibit A.*

19. Since 2005, Clark Capital has contacted RiverSource no less than six times. In its letters, Clark Capital has repeatedly put RiverSource on notice of Clark Capital's rights in its NAVIGATOR® mark, advised RiverSource of Clark Capital's concerns about RiverSource's use of PORTFOLIO NAVIGATOR, and expressed its objection to RiverSource's use of PORTFOLIO NAVIGATOR.

COUNT I – FEDERAL TRADEMARK INFRINGEMENT

20. Clark Capital repeats and re-alleges, and incorporates by reference, the foregoing paragraphs as though they were fully set forth at length herein.

21. The federal registration of Clark Capital's NAVIGATOR® mark evidences Clark Capital's exclusive right to use the NAVIGATOR® mark in connection with investment advisory services in the field of stocks and mutual funds. 15 U.S.C. § 1115.

22. Clark Capital's Registration No. 1,662,756 for NAVIGATOR has acquired incontestable status. Thus, the registration for this mark shall be conclusive evidence of the validity of the investment advisory services in the field of stocks and mutual funds specified in the affidavits filed under the provisions of 15 U.S.C. § 1065 and/or the renewal applications filed under the provisions of 15 U.S.C. § 1059.

23. RiverSource uses the PORTFOLIO NAVIGATOR designation in connection with financial and investment advisory services including an asset allocation program which includes a series of investment funds known as PORTFOLIO NAVIGATOR funds.

24. RiverSource's use of the PORTFOLIO NAVIGATOR designation, which fully incorporates Clark Capital's pre-existing NAVIGATOR® mark, is confusingly similar thereto, and infringes upon Clark Capital's NAVIGATOR® mark. The marks create the same commercial impression and are confusingly similar.

25. Clark Capital's and RiverSource's respective financial services and products are offered in the same channels of trade and are directed to the same or similar clients. RiverSource's clients are individuals making financial planning and investment decisions. Similarly, many of Clark Capital's clients are individuals making financial planning and investment decisions.

26. RiverSource's use of the PORTFOLIO NAVIGATOR designation in connection with financial and investment advisory services including an asset allocation program which includes

a series of investment funds known as PORTFOLIO NAVIGATOR funds, is likely to cause confusion or mistake or to deceive, as to the source, affiliation or sponsorship with Clark Capital's NAVIGATOR® mark for its financial services and products, including financial planning and investment advisory services, financial planning for retirement services, on-line financial planning services, wealth management, asset allocation and investment consulting services, in violation of 15 U.S.C. § 1051 et seq., specifically §§ 1114-1118.

27. This unauthorized use by RiverSource constitutes infringement of Clark Capital's registered NAVIGATOR® mark, described above, in violation of 15 U.S.C. § 1051 et seq., to the substantial and irreparable injury of the public and of Clark Capital's NAVIGATOR® mark, business reputation, and goodwill.

28. The activities of RiverSource complained of herein constitute willful and intentional infringement of Clark Capital's federally registered NAVIGATOR® mark, in derogation of Clark Capital's rights in violation of 15 U.S.C. §§ 1114 and 1117. Acts of infringement commenced and have continued in spite of RiverSource's knowledge that the use of Clark Capital's NAVIGATOR® mark was and is in contravention of Clark Capital's rights.

29. Clark Capital has not given consent directly or indirectly to RiverSource to use the PORTFOLIO NAVIGATOR designation, or any designations similar thereto.

30. RiverSource's conduct has caused and, if not enjoined, will continue to cause irreparable damage to the rights of Clark Capital in its marks and in its business, reputation, and goodwill.

31. Clark Capital's damages from the aforesaid unlawful actions of RiverSource, to the extent ascertainable, have not yet been determined.

32. Clark Capital seeks attorney's fees and costs given the willful conduct of RiverSource.

33. Clark Capital seeks treble damages given the willful conduct of RiverSource.

COUNT II - FEDERAL UNFAIR COMPETITION

34. Clark Capital repeats and re-alleges, and incorporates by reference, the foregoing paragraphs as though they were fully set forth at length herein.

35. Clark Capital's NAVIGATOR® mark is distinctive and has acquired secondary meaning and significance in the minds of the relevant public.

36. After Clark Capital's adoption and use of its NAVIGATOR® Marks in connection with financial services and products, including financial planning and investment advisory services, financial planning for retirement services, on-line financial planning services, wealth management, asset allocation and investment consulting services, and with actual and constructive notice thereof, RiverSource adopted and used the PORTFOLIO NAVIGATOR designation.

37. Clark Capital has not given consent directly or indirectly to RiverSource to use the PORTFOLIO NAVIGATOR designation, or any designation similar thereto

38. RiverSource's activities are likely to cause confusion, or to cause mistake, or to deceive, causing great harm to Clark Capital's reputation and goodwill.

39. RiverSource has unfairly competed with Clark Capital's NAVIGATOR® mark in interstate commerce and in this district by various acts, including marketing, providing, offering for sale, and selling financial and investment advisory services including an asset allocation program which includes a series of investment funds known as PORTFOLIO NAVIGATOR

funds. This unauthorized use by RiverSource constitutes unfair competition to the substantial and irreparable injury of the public and of Clark Capital's marks, business reputation, and goodwill. 15 U.S.C. § 1125.

40. The activities of RiverSource complained of herein constitute willful and intentional tort, in derogation of Clark Capital's rights. Acts of unfair competition commenced and have continued in spite of RiverSource's knowledge that the use of Clark Capital's NAVIGATOR® mark was and is in contravention of Clark Capital's rights.

41. RiverSource's conduct has caused and, if not enjoined, will continue to cause irreparable damage to the rights of Clark Capital in its marks and in its business, reputation, and goodwill.

42. Clark Capital's damages from the aforesaid unlawful actions of RiverSource, to the extent ascertainable, have not yet been determined.

43. Clark Capital seeks attorney's fees and costs given the willful conduct of RiverSource.

44. Clark Capital seeks treble damages given the willful conduct of RiverSource.

PRAYERS FOR RELIEF

1. That the Court preliminary and permanently enjoin and restrain RiverSource, any of RiverSource's officers, directors, agents, employees and all persons in active concert or participation with RiverSource who receives actual notice of the injunction, by personal service or otherwise, from doing, abiding, causing or abetting any of the following:

(a) infringing or contributing to the infringement;

(b) engaging in any acts or activities directly or indirectly calculated to infringe Clark Capital's NAVIGATOR® Marks;

(c) using in selling, offering for sale, promoting, advertising, marketing or distributing of RiverSource's products, advertisements or marketing materials that use the designation PORTFOLIO NAVIGATOR, or any mark similar thereto;

(d) using any configuration or design that is confusingly similar to Clark Capital's NAVIGATOR® mark; and

(e) otherwise competing unfairly with Clark Capital in any manner whatsoever.

2. That the Court find that RiverSource is infringing Clark Capital's NAVIGATOR® mark and is competing unfairly with Clark Capital, and otherwise have been unjustly enriched.

3. That the Court Order RiverSource to deliver up to Clark Capital for destruction, at RiverSource's expense, catalogs, web site materials, literature, brochures, quotes, packaging, signs, promotional materials, advertisements and other communications to the public in the possession or under the control of RiverSource, and any other material or any representations that are or may contain designations similar to Clark Capital's NAVIGATOR® mark.

4. That the Court Order RiverSource to account for and pay to Clark Capital the damages to which Clark Capital is entitled as a consequence of the infringement of Clark Capital's NAVIGATOR® mark.

5. That the Court Order RiverSource to account for and to pay over to Clark Capital all damages suffered by Clark Capital as a result of RiverSource's unfair competition.

6. That the Court enter an order placing reasonable but effective restrictions on the future transactions and activities of RiverSource so as to prevent fraud on the Court and so as to ensure the capacity of RiverSource to pay, and the prompt payment of, any judgment entered against RiverSource in this action.
7. That the Court award Clark Capital its compensatory, incidental, and consequential damages.
8. That the Court award Clark Capital enhanced, treble, and/or punitive damages.
9. That the Court award Clark Capital its reasonable attorney's fees and the costs of this action.
10. That the Court grant Clark Capital such other relief as is just and proper.

DEMAND FOR JURY TRIAL

Clark Capital demands a trial by jury on all triable issues of fact.

Respectfully submitted,



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Attorneys for Plaintiff
Clark Capital Management Group, Inc.

Dated: May 16, 2017

EXHIBIT A



Portfolio Navigator funds

Quarterly performance and commentary

March 31, 2017

The Portfolio Navigator funds

Performance

	Quarter ending 3/31/17					
	3 month	YTD	1 year	3 year	5 year	Since Inception*
VP – Aggressive Portfolio						
VP – Aggressive Portfolio (Class 2) ¹	5.10%	5.10%	11.32%	4.87%	7.64%	8.62%
M&E and Rider Fees ²	4.63%	4.63%	9.32%	2.98%	5.70%	6.65%
M&E fee, rider fee and max surrender charge ³	-3.44%	-3.44%	1.26%	0.35%	4.34%	5.81%
Aggressive Portfolio Benchmark	5.11%	5.11%	12.93%	6.19%	9.32%	–
VP – Moderately Aggressive Portfolio						
VP – Moderately Aggressive Portfolio (Class 2) ¹	4.31%	4.31%	9.15%	4.27%	6.48%	7.52%
M&E and Rider Fees ²	3.84%	3.84%	7.19%	2.38%	4.57%	5.58%
M&E fee, rider fee and max surrender charge ³	-4.23%	-4.23%	-0.87%	-0.28%	3.15%	4.68%
Moderately Aggressive Portfolio Benchmark	4.29%	4.29%	10.54%	5.64%	8.08%	–
VP – Moderate Portfolio						
VP – Moderate Portfolio (Class 2) ¹	3.56%	3.56%	7.30%	3.77%	5.46%	6.50%
M&E and Rider Fees ²	3.09%	3.09%	5.38%	1.89%	3.56%	4.59%
M&E fee, rider fee and max surrender charge ³	-4.98%	-4.98%	-2.68%	-0.79%	2.08%	3.63%
Moderate Portfolio Benchmark	3.49%	3.49%	8.12%	4.96%	6.75%	–
VP – Moderately Conservative Portfolio						
VP – Moderately Conservative Portfolio (Class 2) ¹	2.66%	2.66%	5.32%	3.26%	4.31%	5.29%
M&E and Rider Fees ²	2.20%	2.20%	3.43%	1.40%	2.43%	3.40%
M&E fee, rider fee and max surrender charge ³	-5.87%	-5.87%	-4.63%	-1.31%	0.88%	2.37%
Moderately Conservative Portfolio Benchmark	2.69%	2.69%	5.75%	4.26%	5.41%	–
VP – Conservative Portfolio						
VP – Conservative Portfolio (Class 2) ¹	1.86%	1.86%	3.45%	2.69%	3.20%	4.19%
M&E and Rider Fees ²	1.39%	1.39%	1.60%	0.85%	1.35%	2.32%
M&E fee, rider fee and max surrender charge ³	-6.67%	-6.67%	-6.46%	-1.90%	-0.28%	1.22%
Conservative Portfolio Benchmark	1.88%	1.88%	3.47%	3.63%	4.12%	–

*Inception date - May 7, 2010

Effective March 10, 2016, the Funds' benchmarks have changed. See page 6 for details.

Performance data shown represents past performance and is not a guarantee of future results. The investment return and principal value of an investment will fluctuate so that shares, when redeemed, may be worth more or less than their original cost. Current performance may be lower or higher than the performance data shown. Please call 1-800-333-3437 for performance data current to the most recent month-end.

¹ Reflects fund fees and expenses; does not reflect charges or expenses imposed by the insurance company on subaccounts or contracts. See Annual Fund Operating Expenses in Performance Disclosures section.

² In addition to Fund Fees, reflects deduction of a 0.85% annual Mortality and Expense fee for RAVA 5 Advantage® with a 10-year surrender charge schedule and the standard death benefit, a 0.95% annual SecureSource Stages 2® single life rider fee, and a \$30 contract administration fee. This line is intended to demonstrate the effect that fees and expenses could have on performance, and is not intended to reflect actual fees and charges incurred by an investor nor does it reflect the additional fees associated with other optional benefits.

³ In addition to Fund Fees, reflects deduction of a 0.85% annual Mortality and Expense fee for RAVA 5 Advantage with a 10-year surrender charge schedule and the standard death benefit, a 0.95% annual SecureSource Stages 2 single life rider fee, an 8% declining surrender charge, and a \$30 contract administration fee. This line is intended to demonstrate the effect that fees and expenses could have on performance, and is not intended to reflect actual fees and charges incurred by an investor nor does it reflect the additional fees associated with other optional benefits.

Quarterly Performance Commentary

by Columbia Threadneedle Investments

Economic and Capital Markets Review – 1Q'17

Global equities continued to advance at a swift pace during the first quarter. We expect global growth to stay reasonably firm over the next several months. Some inflection points are looming though, including the possibility that domestic inflation measures will peak over the next few months. The upward trend for inflation in recent months has reinforced a sense that improved economic growth can help foster an extension of the business cycle. However, a pull-back in equities within capital markets cannot be ruled out over the near term. Consider for a moment that the S&P 500 recently enjoyed a 109-day streak without a 1% decline, its longest stretch in nearly 22 years. Another broad measure for U.S. equity performance, the Russell 3000 Index, gained 5.74% during the quarter.

While U.S. equity markets continued to flirt with new highs, overseas markets did manage to make-up some ground on their domestic counterparts during the quarter. A weakening U.S. dollar, which fell by about 2% versus a basket of other developed market currencies, helped the MSCI EAFE Index rise by 7.25%.

Within fixed income markets, corporate bonds and emerging market bonds were some of the best performing areas in the quarter. After a strong start to the year, high yield corporate bonds struggled somewhat in March. Still, high yield corporate bonds, as measured by the performance of the Bloomberg Barclays US Corporate High Yield Bond Index, posted a total return of 2.70% during the quarter. No major fixed income sector generated a negative total return in the quarter.

From an economic perspective, we remain centered around a base case scenario that sees U.S. growth in a range of 2.0% to 2.5% for 2017. Against this backdrop of steady economic growth, and, with inflation hovering around 2% we believe the Fed will be prompted to continue to raise rates. Improved business and consumer confidence should lead to a slight upshift in demand, together with a modest albeit growing amount of fiscal stimulus in the second half of the year. The expectation of tax relief, regulatory relief and overall reflationary efforts is something we continue to believe can extend the business cycle into 2018 and potentially beyond. U.S. consumer personal balance sheets are still in reasonably good shape but there are areas of concern. Student debt and auto loans are two of the more evident concerns; each has grown significantly in respect to disposable income over the past several years.

Portfolio Navigator Funds – Performance Drivers in 1Q'17

Returns were positive across all five funds with the more aggressively positioned portfolios performing best among the series. During the quarter the VP Conservative Portfolio returned 1.86%, the VP Moderately Conservative Portfolio returned 2.66%, the VP Moderate Portfolio returned 3.56%, the VP Moderately Aggressive Portfolios returned 4.31% and the VP Aggressive Portfolio returned 5.10% (all figures net of investment management fees).

Two of the five Portfolio Navigator series funds outperformed their benchmarks in the 1st quarter (net of investment management fees). The three funds that trailed blended benchmarks were, on average, two-tenths of one percent behind the benchmark for the quarter.

The portfolios all remained near neutral, versus benchmark weights, for equity allocations with a slight overweight position in the more aggressively positioned funds. Fixed income allocations remained several percentage points below that of the benchmark(s) allocation.

Overall underlying manager performance within the funds contributed favorably to performance during the quarter relative to the funds' benchmarks. U.S. large cap managers proved to be one of the strongest contributors, and core fixed income managers also helped. Within small cap equities, a tilt toward more value oriented investment managers hurt relative results as growth oriented investment managers fared noticeably better. An overweight (out-of-benchmark) position remained in alternative investment strategies. This position is largely centered on trying to help reduce volatility and offer additional diversification. During the quarter, commodity related investments and a managed futures strategy resulted in underperformance within the alternatives segment of the funds.

Early in the quarter, the portfolio managers slightly increased exposure to European equities inside the tactical sleeve. This was done in an effort to reduce the magnitude of an underweight position. Toward the middle of the quarter, tactical trades intended to raise exposure to Japanese equities were added in the more aggressively positioned funds.

Some of the underlying funds that served as key contributors, as well as detractors, from relative results during the quarter are shown below (please note that an underlying fund being a contributor or detractor is not necessarily indicative of how it performed relative to its own benchmark). Not all funds shown below are held inside each fund at the same exposure weight. As a result, the impact of each contributor/detractor will vary by fund.

Contributors	Detractors
<ul style="list-style-type: none"> • VP – Loomis Sayles Growth Fund • VP – Nuveen Winslow Large Cap Growth Fund • Columbia VP – Large Cap Growth Fund • Columbia VP – Emerging Markets Fund • VP – Morgan Stanley Advantage Fund • Columbia VP – Intermediate Bond Fund • Columbia VP – Contrarian Core Fund • VP – American Century Diversified Bond Fund • Columbia VP – Long Government/Credit Fund 	<ul style="list-style-type: none"> • Columbia VP – Partners Small Cap Value Fund • Columbia VP – U.S. Equities Fund • Columbia VP – Select Large Cap Value Fund • Columbia VP – Commodity Strategy Fund • VP – DFA International Value Fund • VP – T. Rowe Price Large Cap Value Fund • VP – CenterSquare Real Estate Fund • VP – AQR Managed Futures Fund

Source: Columbia Threadneedle Investments, as of 3/31/17

Market Outlook

Consumer confidence here in the U.S. has soared to historic high levels since the election of President Trump, and confidence levels reflect expectations for a business-friendly political agenda. Therefore, unsuccessful implementation of pro-growth policies would be disappointing to markets. The global growth outlook appears mostly healthy and stable, however a global equity correction cannot be ruled out. If a correction were to occur we do not see an outright bear market taking shape over the near-term. The latest global PMIs (purchasing managers index surveys) point to above-average economic expansion with signs of improving momentum in the months ahead. Analysts' consensus for S&P 500 operating earnings have come down over the past few months but still show earnings growth at a rate of 9.1% (year-over-year earnings growth) for the index. If this growth rate is realized it would be the largest year-over-year quarterly rate of growth since Q4 2011 (11.6%). Equity prices have adjusted higher in anticipation of this improved earnings outlook. Other indicators of growth are leaning somewhat more cautious and not corroborating further improvements. For instance, small caps are underperforming large caps and oil has underperformed gold of recent.

Within fixed income we have a general view that is neutral in scope for taking on interest rate risk within the portfolios. At the end of 2016 this view was cautious as inflation measures were signaling continued pressure on interest rate sensitive assets. However, while concerns tied to a rising rate environment persist over the medium-to-long term, over the short-term we feel a more neutral outlook is warranted.

We currently recommend a neutral stance on U.S. equities. From a tactical perspective, we continue to favor equity markets outside of the U.S. primarily because of more favorable valuations. We are also witnessing a cyclical upswing in economic activity across different regions outside the United States.

Global growth may be poised to move higher for several reasons, and, the plunge in the commodity sector that investors experienced during 2014 and 2015 seems to have finally run its course for this cycle. In fact, in contrast to traditional equities, which in many cases are close to fresh highs, commodity markets appear to be forming a base at relatively low levels. Prevailing low commodity prices continue to stimulate demand growth while investment in future production continues to be restricted, tightening supply. These dynamics along with improved global growth should help support commodity sector performance.

Blended benchmarks

	VP – Aggressive Portfolio	VP – Moderately Aggressive Portfolio	VP – Moderate Portfolio	VP – Moderately Conservative Portfolio	VP – Conservative Portfolio
Russell 3000 Index	56.0%	46.0%	35.0%	24.0%	14.0%
MSCI EAFE	24.0%	19.0%	15.0%	11.0%	6.0%
Bloomberg Barclays Capital U.S. Aggregate Bond Index	20.0%	35.0%	50.0%	65.0%	80.0%

Russell 3000 - an index of the largest 3,000 U.S. stocks by market cap.

MSCI EAFE - an index of developed international stock markets.

Bloomberg Barclays Capital U.S. Aggregate Bond - an index of high-quality government and corporate bonds.

Columbia Threadneedle Investments (Columbia Threadneedle) is the global brand name of the Columbia and Threadneedle group of companies.

There is no guarantee that investment objectives will be satisfied or that return expectations will be met. Asset allocation does not assure a profit or protect against a loss in declining markets.

Annuity product fees will affect performance and can be found in the variable product performance sheets located at RiverSource.com > Annuities > Performance & Rates.

Please carefully consider the investment objectives, risks, charges and expenses of any variable fund and its related variable contract before investing. For variable fund and variable contract prospectuses, which contain this and other important information, call 1-800-333-3437. Please read the prospectuses carefully before you invest.

Variable annuities are insurance products that are complex long-term investment vehicles that are subject to market risk, including the potential loss of principal invested.

The Portfolio Navigator funds are sold exclusively as underlying investment options of variable annuity and life insurance products offered by RiverSource Life Insurance Company and RiverSource Life Insurance Co. of New York (collectively, RiverSource Life). The funds are managed by Columbia Management Investment Advisers, LLC, an affiliate of RiverSource Life. RiverSource Life, Columbia Management and their affiliates may receive revenue related to assets allocated to the funds. Prior to allocating contract or policy values to a subaccount that invests in one of the funds, you should read the description contained in the applicable variable product and fund prospectuses.

Index performance is provided for illustrative purposes only and does not reflect the fees and expenses of investing in variable products. Indices are not intended to represent specific investments. Investors cannot invest directly in an index.

Annual Fund Operating Expenses (expenses you pay each year as a percentage of the value of your investment)

	Moderately Aggressive	Moderate	Moderately Conservative	Conservative
Variable Portfolio	1.07%	1.03%	0.99%	0.93%

In general, equity securities tend to have greater price volatility than debt securities. The market value of securities may fall, fail to rise, or fluctuate, sometimes rapidly and unpredictably. There are risks associated with fixed income investments, including credit risk, interest rate risk, and prepayment and extension risk. In general, bond prices rise when interest rates fall and vice versa. This effect is more pronounced for longer-term securities. Investments in foreign securities involve certain risks not associated with investments in U.S. companies, due to political, regulatory, economic, social and other conditions or events occurring in the country, as well as fluctuations in currency and the risks associated with less developed custody and settlement practices. See each fund's prospectus for specific risks associated with the fund.

RAVA 5 Advantage: ICC09 411265, 411265 and state variations thereof.

Rider numbers: SecureSource Stages 2: 411296-SG and 411296-JT. Features may vary, have limitations or may not be available in some states.

Variable Annuities:

Are not a deposit of any bank or bank affiliate	Are not FDIC insured	Are not insured by any federal government agency	Are not bank guaranteed	May lose value
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